

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>  <b>CIRCUIT CITY STORES, INC., et al.,</b> <b>Debtors.</b>	) ) ) ) )	<b>Case No.: 08-35653-KRH</b> <b>Chapter 11</b>
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**SUPPLEMENTAL VERIFIED STATEMENT OF ATTORNEYS FOR  
CREDITORS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

COME NOW William A. Gray, Esquire; C. Thomas Ebel, Esquire; Peter M. Pearl, Esquire; and William Ashley Burgess, Esquire; and the law firm of Sands, Anderson, Marks & Miller, P.C. ("Sands Anderson"), as counsel for the parties in interest and/or creditors listed on **EXHIBIT A** attached hereto and incorporated herein by reference (collectively, the "Current Clients"), and now counsel for two additional parties in interest and/or creditors identified herein, asserting claims against Circuit City Stores., *et al.*, and certain of its affiliated Debtors (collectively, the "Debtors"), and make the following verified statement pursuant to *Federal Rule of Bankruptcy Procedure* 2019.

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William A. Gray, Esquire – VSB #46911  
W. Ashley Burgess, Esquire – VSB # 67998  
C. Thomas Ebel, Esquire – VSB #18637  
Peter M. Pearl, Esquire – VSB #22344  
Sands, Anderson, Marks & Miller, P.C.  
801 East Main Street, Suite 1800  
Post Office Box 1998  
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(804) 783-7291 Facsimile

*Counsel for: Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Monument Consulting, LLC; McAlister Square Partners, Ltd; Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Encinitas PFA, LLC; Cardinal Court, LLC; Phyllis M. Pearson; T.J.Maxx of CA, LLC; Baker Natick Promenade LLC; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP-Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; The Stop & Shop Supermarket Company; BPP-VA, LLC; BPP-WB LLC; Colonial Heights Holdings, LLC; E&A Northeast Limited Partnership; Ray Mucci's, Inc.; Interstate Augusta, LLC; NPP Development, LLC; Route 146 Millbury, LLC; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; BevCon I, LLC; Vornado Caguas LP; East Brunswick VF LLC; Green Acres Mall, LLC; Vornado Gun Hill Road LLC; Marlton VF, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Wayne VF LLC a/k/a Star Universal ;Towson VF LLC; VNO Mundy Street LLC; VNO Tru Dale Mabry, LLC; Christopher Borglin; Paul Schaapman; CSI Construction Company; Hilton Ellis Epps, Sr.; Chatham County, Georgia Tax Commissioner; DEV Limited Partnership; Kelly Breitenbecher; A.D.D. Holdings, L.P.; Hillson Electric Incorporated; John Rohrer Contracting Company, Inc.; Lang Construction, Inc.; and Rebecca Hyllton DeCamps; Denon Electronics; Snell Acoustics, Inc.; Mid-American Insulation, Inc.; Midwest Block & Brick, Inc.; McCorkendale Construction; Premier Contracting, Inc.; Lee County, Mississippi Tax Collector; DeSoto County, Mississippi; Sensormatic Electronic Corporation; OmniMount Systems, Inc.; Metra Electronics Corporation; and Tamrac, Inc.*

1. Sands Anderson's Current Clients' names are set forth on **EXHIBIT A** attached hereto and incorporated herein by reference. Prior statements pursuant to *Federal Rules of Bankruptcy Procedure* 2019 ("2019 Statements") have been filed pertaining to the Current Clients. Sands Anderson hereby supplements the previous 2019 Statements.

2. Sands Anderson has now been retained by two additional creditors, whose names, addresses and brief explanations of their interests are as follows (the "New Clients"):

- a. Metra Electronics Corporation  
c/o Edward P. Jackson, Esquire  
Edward P. Jackson, P.A.  
255 N. Liberty Street  
Jacksonville, FL 32203  
Telephone: 904-358-1952

**Nature of Interest:** Rights and remedies in connection with goods sold to Circuit City. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.

- b. Tamrac, Inc.  
Attn: Russell Kantor  
9240 Jordan Avenue  
Chatsworth, CA 91311  
Telephone: 818-407-9500

**Nature of Interest:** Rights and remedies in connection with goods sold to Circuit City. All claims or rights arose by virtue of the client's contractual, statutory, and/or common law rights with or against one or more of the Debtors.

3. The facts and circumstances relating to the employment of Sands, Anderson by the New Clients are that Sands Anderson serves as bankruptcy counsel to the New Clients to represent their interests in the Debtors' jointly-administered bankruptcy cases. The New Clients are billed monthly at Sands Anderson's normal hourly rates for its shareholders, counsel, associates, and legal assistants for time spent and for costs incurred in providing legal services, pursuant to Sands Anderson's standard terms and engagement.

4. The New Clients have been advised of, and have consented to, Sands Anderson's representation of all other clients.

5. Sands Anderson reserves the right to supplement and/or amend this Statement at any time in the future.

**Respectfully Submitted,**

**SANDS, ANDERSON, MARKS & MILLER, P.C.**

/s/ William A. Gray

William A. Gray, Esquire – VSB #46911

C. Thomas Ebel, Esquire – VSB #18637

Ashley Burgess, Esquire – VSB # 67998

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*Counsel for: A.D.D. Holdings, L.P.; Alexander's of Rego Park Center, Inc.; Amherst VF LLC; Baker Natick Promenade LLC; BevCon I, LLC; Christopher Borglin; BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership; BPP Muncy, LLC; BPP-NY LLC; BPP-OH LLC; BPP-Redding LLC; BPP-SC LLC; BPP-VA LLC; BPP-WB LLC; Kelly Breitenbecher; Cardinal Court, LLC; Chatham County, Georgia Tax Commissioner; Colonial Heights Holdings, LLC; CSI Construction Company; DEV Limited Partnership; Rebecca Hylton DeCamps, Denon Electronics, DeSoto County, Mississippi; E&A Northeast Limited Partnership; East Brunswick VF LLC; Encinitas PFA, LLC; Hilton Ellis Epps, Sr.; Reverend Dwayne Funches, individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, individually; Green Acres Mall, LLC; Hillson Electric Incorporated; Interstate Augusta, LLC; Lang Construction, Inc.; Lee County, Metra Electronics Corporation, Mississippi Tax Collector; Mansfield SEQ 287 and Debbie, Ltd.; Marlton VF, LLC; McAlister Square Partners, Ltd.; McCorkendale Construction; Mid-American Insulation, Inc.; Midwest Block & Brick, Inc.; Monument Consulting, LLC; NPP Development, LLC; North Bergen Tonnelle Plaza, LLC; North Plainfield VF, LLC; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; OmniMount Systems, Inc.; Phyllis M. Pearson; PrattCenter, LLC; Premier Contracting, Inc.; Ray Mucci's, Inc.; Route 146 Millbury, LLC; John Rohrer Contracting Company, Inc.; Paul Schaapman; Sensormatic Electronic Corporation; Snell Acoustics, Inc.; Tamrac, Inc.; The Stop & Shop Supermarket Company; T.J. Maxx of CA, LLC; Towson VF LLC; UTC I, LLC; Valley Corners Shopping Center, LLC; Vornado Caguas LP; Vornado Gun Hill Road LLC; Wayne VF LLC a/k/a/ Star Universal; VNO Mundy Street LLC; and VNO Tru Dale Mabry, LLC.*

**VERIFICATION**

I, William A. Gray, an attorney with Sands Anderson Marks & Miller, P.C., after due inquiry declare under penalty of perjury, and pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this Verified Statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge and belief.

/s/ William A. Gray

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of November, 2009, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter.

/s/ William A. Gray

**EXHIBIT A TO RULE 2019 STATEMENT**

<b>Creditor</b>
A.D.D. Holdings, L.P.
Alexander's of Rego Park Center, Inc.
Amherst VF LLC
Baker Natick Promenade LLC
BevCon I, LLC
BPP-Conn LLC, f/k/a WEC 95B Manchester Limited Partnership
BPP-Muncy, LLC
BPP-NY LLC
BPP-OH LLC
BPP-Redding LLC
BPP-SC LLC
BPP-VA LLC
BPP-WB LLC
BC Hardscapes, LLC
Boston Acoustics, Inc.
Cardinal Court, LLC
Chatham County, Georgia Tax Commissioner
Christopher Borglin
Colonial Heights Holdings, LLC
CSI Construction Company
Cynthia Olloway, as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor
Cynthia Olloway, Individually
DEV Limited Partnership
D&M Holdings, US Inc.
DeSoto County, Mississippi
E&A Northeast Limited Partnership
East Brunswick VF LLC
Emily Funches, Individually
Encinitas PFA, LLC
Green Acres Mall, LLC
Hillson Electric Incorporated
Hilton Ellis Epps, Sr.
Interstate Augusta, LLC
John Rohrer Contracting Company, Inc.
Kelly Breitenbecher
Lang Construction, Inc.
Lee County, Mississippi Tax Collector
Lovera S. Funches, Individually
Mansfield SEQ 287 and Debbie, Ltd.
Marlton VF, LLC
McAlister Square Partners, Ltd.

Creditor
McCorkendale Construction
Metra Electronics Corporation
Mid-America Insulation, Inc.
Midwest Block & Brick
Monument Consulting, LLC
North Bergen Tonnelle Plaza, LLC
North Plainfield VF, LLC
NPP Development, LLC
OmniMount Systems, Inc.
Paul Schaapman
Phyllis M. Pearson
PrattCenter, LLC
Ray Mucci's, Inc.
Rebecca Hylton DeCamps
Reverend Dwayne Funches as Independent Executor of the Estate of Travis Funches
Reverend Dwayne Funches as Independent Executor of the Estate of Dione Funches
Reverend Dwayne Funches as Independent Executor of the Estate of Dwayne Funches, Jr.
Reverend Dwayne Funches, Individually
Route 146 Millbury, LLC
Sensormatic Electronic Corporation
Shatira Funches, Individually
Snell Acoustics, Inc.
Star Universal LLC
T.J. Maxx of CA, LLC
Tamrac, Inc.
The Stop & Shop Supermarket Company
Towson VF LLC
UTC I, LLC
Valley Corners Shopping Center, LLC
VNO Mundy Street LLC
VNO Tru Dale Mabry, LLC
Vornado Caguas LP
Vornado Gun Hill Road LLC

**EXHIBIT A**